

Hearing Date: February 24, 2009 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: February 20, 2009 at 4:00 p.m. (prevailing Eastern Time)

Trent P. Cornell, Esq. (IL 6242712), *Pro Hac Vice* (pending)
Jon D. Cohen, Esq. (IL 6206666), *Pro Hac Vice* (to be filed)
STAHL COWEN CROWLEY ADDIS LLC
55 West Monroe Street, Suite 1200 Chicago, Illinois 60603
(312) 641-0060
(312) 641-6959 facsimile

Barry R. Lax, Esq.
Brent A. Burns, Esq.
LAX & NEVILLE LLP
1412 Broadway, Ste 1407
New York, NY 10018
(212) 696-1999 x220
(212) 566-4531 facsimile

Counsel for Paul Higgins, James Conger, Doug Kittle
and Joni Walls and on behalf of other Delphi Non-Union
Salaried Retirees

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	Chapter 11
In re	:	
	:	Case No. 05-44481 (RRD)
DELPHI CORPORATION, et al.,	:	
	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF (A) MOTION TO SHORTEN NOTICE WITH RESPECT
TO MOTION TO APPOINT OFFICIAL RETIREE COMMITTEE
PURSUANT TO 11 U.S.C. § 1114(d) and (B) MOTION TO APPOINT
OFFICIAL RETIREE COMMITTEE PURSUANT TO 11 U.S.C. § 1114(d)**

PLEASE TAKE NOTICE THAT on February 17, 2009, Paul M. Higgins, James Conger, Doug A. Kittle, Joni Walls and other Non-Union Salaried retirees of Delphi Corporation and its affiliated Debtor entities (“Debtors”),¹ (collectively “Affected Retirees”) filed a (a) Motion to Shorten Notice with Respect to Motion to Appoint Official Retiree Committee Pursuant to 11 U.S.C. § 1114 (the “Motion to Shorten Time”) and (b) Motion to Appoint Official Retiree Committee Pursuant to 11 U.S.C. § 1114 (“Motion to Appoint Retiree Committee.”)

PLEASE TAKE FURTHER NOTICE THAT if no written objections to the Motion to Shorten Time or the Motion to Appoint Retiree Committee are filed timely, served and received in accordance with the requirements set forth below, an order (substantially in the form enclosed herewith) will be submitted that will provide that the Motion to Shorten Time and/or the Motion to Appoint Retiree Committee, as applicable, shall be granted in their entirety. If written objections are filed timely, served and received, a hearing to consider approval of the Motion to Shorten Time or the Motion to Appoint Retiree Committee, as applicable, on a final basis will be held at **10:00 a.m Eastern Time on February 24, 2009**, before the Honorable Robert D. Drain, United States Bankruptcy Judge, in the Bankruptcy Court, Courtroom 610, One Bowling Green, New York, New York 10004-1408 (“the Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion to Shorten Time and/or Motion to Appoint Retiree Committee must (a) be in writing, (b)

¹ Attached as Exhibit A to Motion to Appoint Official Retiree Committee is a list of salaried Delphi retirees that have individually contacted this law firm as of the date of filing and expressed support for the formation of an Official Retiree Committee and that this law firm represent them in the Delphi bankruptcy with respect to their retiree benefits. This list continues to grow rapidly and is expected encompass hundreds of more retirees by the hearing on February 24th.

conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Supplemental Order Under 11 U.S.C. §§ 102(1) and 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered March 20, 2006 (Docket No. 2883) ("Supplemental Case Management Order"), and the Thirteenth Supplemental Order Under 11 U.S.C. §§ 102(1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures, entered December 4, 2008 (Docket No. 14534) (together with the Supplemental Case Management Order, the "Case Management Orders"), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended)—registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr.), (iii) counsel for the agent under the postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att'n: Donald Bernstein and Brian Resnick), (iv) counsel for the official committee of unsecured creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att'n: Robert J Rosenberg and Mark A. Broude), (v) counsel for the official committee of equity

security holders, Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York, New York 10004 (Att'n: Bonnie Steingart), and (vi) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Brian Masumoto) in each case so as to be **received** no later than **4:00 p.m. (prevailing Eastern time) on February 20, 2009**.

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PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein, in accordance with the Case Management Orders (and the shortened notice and filing procedures reflected herein) will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion to Shorten Notice and/or Motion to Appoint Retiree Committee are timely filed and served in accordance with the procedures set forth herein and in the Case Management Orders, the Bankruptcy Court may enter an order granting the Motion to Shorten Time and Motion to Appoint Retiree Committee without further notice.

Dated: New York, New York
February 17, 2009

On behalf of Paul Higgins, James Conger, Doug
Kittle & Joni Walls and other Delphi Non-Union Salaried
Retirees and other Affected Retirees reflected on Exhibit A

/s/ Barry R. Lax
Local Counsel

Local Counsel

Barry R. Lax, Esq.
Brent A. Burns, Esq.
LAX & NEVILLE LLP
1412 Broadway, Ste 1407
New York, NY 10018
(212) 696-1999 x220
(212) 566-4531 facsimile
blax@laxneville.com

Lead Counsel

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Jon D. Cohen, Esq. (IL 6206666), *Pro Hac Vice* (to be filed)
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Chicago, Illinois 60603
(312) 641-0060
(312) 641-6959 facsimile
tcornell@stahlcowen.com